

EXHIBIT BB



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CLIENT/MATTER NUMBER
085437-3000

June 20, 2006

VIA FACSIMILE AND U.S. MAIL

Greg Pullman
Staff Director
SEIU, Local 715
2302 Zanker Road
San Jose, CA 95131-1115

Re: Stanford Hospital & Clinics and SEIU, Local 715

Dear Mr. Pullman:

This letter responds to yours of June 14, 2006. I am not sure what in my earlier correspondence of June 7, 2006 you contend is a misrepresentation, misunderstanding or misstatement. The various actions by UHW representatives and Union counsel are documented. I did not misunderstand the request made to send dues directly to UHW, which was quite straightforward. I did not misrepresent your statement in an e-mail to Laurie Quintel that the UHW representatives were handling all aspects of the representation of SHC/LPCH employees for whom SEIU Local 715 is the certified representative. I did not misrepresent or misunderstand the grievances filed in the name of "UHW and its members."

In your June 14 letter you describe the situation as one where Local 715 has requested that UHW provide two (2) employees to act under the direction of Local 715 to represent Local 715 and the employees at Stanford Hospital, and state that "[t]hat is all that is happening." However, according to the Hearing Officers' Joint Report and Recommendations to SEIU International's International Executive Committee (IEC) issued on June 9, 2006, two (2) days after my earlier letter to you, UHW has entered into a "service agreement" with SEIU Local 715. That same Hearing Officers' Joint Report and Recommendations also included a recommendation, which has already been adopted by the IEC and announced by letter dated June 11, 2006, that Local 715's representational rights be transferred to UHW as soon as feasible. Clearly, a loan of two (2) UHW employees to assist SEIU Local 715 is not all that is "going on."

Given all of these facts and developments, my client needs more than ever to understand the status, scope and nature of the current and anticipated arrangements between UHW and SEIU Local 715 as it relates to the issue of which organization is controlling the representation. It is for that reason that I made the earlier request on behalf of my client, and renew it now, for documents embodying the terms of that relationship. Indeed, the "service agreement" referenced in

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the Joint Report and Recommendations provides a good starting point for my client to determine whether, as you assert, these two (2) UHW employees have in fact only been loaned to SEIU Local 715 and remain under your control, or whether there is more involved; and ultimately whether it is obligated to acknowledge and deal with these two (2) individuals, or any other employees of UHW as Local 715 representatives.¹ Please provide a copy of that service agreement so that we might review it. Similarly, I request on behalf of my client any other documents that will demonstrate that Local 715 remains in active control of the representation of the SHC/LPCH bargaining unit employees. We also request any and all documents relating to any plans to make a purported transfer of representational rights for the employees of SHC/LPCH from SEIU Local 715 to UHW.

I understand that you have been directed by the International to comply with and support the decision of the IEB with respect to its decision to remove the SHC/LPCH unit from Local 715, and to divide SEIU Local 715 into several different pieces. However, my client has the right to information necessary for it to make a determination concerning the current status of your organization as the exclusive representative in light of the already existing "arrangement" between SEIU Local 715 and UHW and the International's directive that representational rights be transferred as soon as feasible. It also has the right to information necessary to determine whether it is obligated to accept any purported transfer of representational rights under the National Labor Relations Act.

Finally, you incorrectly state that my client is refusing to recognize SEIU Local 715. My earlier correspondence makes it clear that that is far from the case. Rather, unless and until it can satisfy itself that your version of the relationship is correct, it is simply refusing to recognize or deal with representatives of UHW in connection with its legal duty to recognize and deal with SEIU Local 715 as the exclusive representative of certain of its employees.² SHC/LPCH is more than willing to meet and deal with representatives of Local 715 designated by you for such purposes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laurence R. Arnold', with a stylized flourish at the end.

Laurence R. Arnold

LRA:sey
cc: Laurie Quintel

¹ Contrary to your present claim that only two persons have been loaned, in earlier correspondence you identified four (4) persons who were handling the representation.

² There is, of course, the additional problem that, even if my client was satisfied that Local 715 actually retains active control of the representation, the two (2) individuals identified by you as the two (2) representatives loaned by UHW to Local 715 have been banned from the Employers' premises as provided for in the parties' (SHC/LPCH and Local 715) Agreement. Since they are not permitted on premises, it is not possible for these individuals to attend meetings with the Employer on its premises.

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*** SEND SUCCESSFUL ***



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| Laurie Quintel Stanford Hospital & Clinics | (650) 725-2770 | (650) 723-2370 |

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